

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

TERRY MORROW

(Enter the full name of the plaintiff.)

v.

Case No. CIV-24-591-F
(Court Clerk will insert case number)

- (1) Okla City Board of City Comm.
(2) Turn Key Health LLC
(3) STEVEN KELLER

(Enter the full name of each defendant. Attach additional sheets as necessary.)

FILED

JUN 10 2024

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY [Signature], DEPUTY

PRO SE PRISONER CIVIL RIGHTS COMPLAINT

Initial Instructions

1. You must type or legibly handwrite the Complaint, and you must answer all questions concisely and in the proper space. Where more space is needed to answer any question, you may attach a separate sheet.
2. You must provide a full name for each defendant and describe where that defendant resides or can be located.
3. You must send the original complaint and one copy to the Clerk of the District Court.
4. You must pay an initial fee of \$402 (including a \$350 filing fee and a \$52 administrative fee). The complaint will not be considered filed until the Clerk receives the \$402 fee or you are granted permission to proceed *in forma pauperis*.
5. If you cannot prepay the \$402 fee, you may request permission to proceed *in forma pauperis* in accordance with the procedures set forth in the Court's form application to proceed *in forma pauperis*. See 28 U.S.C. § 1915; Local Civil Rule 3.3.

- If the court grants your request, the \$52 administrative fee will not be assessed and your total filing fee will be \$350.
- You will be required to make an initial partial payment, which the court will calculate, and then prison officials will deduct the remaining balance from your prison accounts over time.
- These deductions will be made until the entire \$350 filing fee is paid, **regardless of how the court decides your case.**

7. The Court will review your complaint before deciding whether to authorize service of process on the defendants. *See* 28 U.S.C. §§ 1915(e)(2), 1915A; 42 U.S.C. § 1997e(c)(1). If the Court grants such permission, the Clerk will send you the necessary instructions and forms.

8. If you have been granted permission to proceed *in forma pauperis*, the United States Marshals Service will be authorized to serve the defendants based on information you provide. If you have not been granted permission to proceed *in forma pauperis*, you will be responsible for service of a separate summons and copy of the complaint on each defendant in accordance with Rule 4 of the Federal Rules of Civil Procedure.

COMPLAINT

I. Jurisdiction is asserted pursuant to:

☒ 42 U.S.C. § 1983 and 28 U.S.C. § 1343(a)(3) (NOTE: these provisions generally apply to state prisoners), or

Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971), and 28 U.S.C. § 1331 (NOTE: these provisions generally apply to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

Oklahoma Constitution Article 2, Section 7 (Due process of law)

Oklahoma Constitution Article 2, Section 6 (Access to courts)

II. State whether you are a:

- ☐ Convicted and sentenced state prisoner
☐ Convicted and sentenced federal prisoner
☒ Pretrial detainee
☐ Immigration detainee
☐ Civilly committed detainee
☐ Other (please explain) _____

III. Previous Federal Civil Actions or Appeals

List each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility.

1. Prior Civil Action/Appeal No. 1

a. Parties to previous lawsuit:

Plaintiff(s): _____

Defendant(s): _____

b. Court and docket number: _____

c. Approximate date of filing: _____

d. Issues raised: _____

e. Disposition (for example: Did you win? Was the case dismissed? Was summary judgment entered against you? Is the case still pending? Did you appeal?): _____

f. Approximate date of disposition: _____

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on a separate sheet(s).

IV. Parties to Current Lawsuit

State information about yourself and each person or company listed as a defendant in the caption (the heading) of this complaint.

1. Plaintiff

Name and any aliases: MR. TERRY MORROW
Address: 201 N. Shartel Okla. City, OK 73102
Inmate No.: 140052339

2. Defendant No. 1

Name and official position: Okla. Board of County
Commissioners
Place of employment and/or residence: 320 Robert S. Kerr Ave,
Suite 101 Okla. City, OK 73102
How is this person sued? ☒ official capacity, () individual capacity, () both

3. Defendant No. 2

Name and official position: Turn Key Health, LLC
Place of employment and/or residence: 201 N. Shartel OKC,
OK 73102
How is this person sued? ☒ official capacity, () individual capacity, () both

If there are more than two defendants, describe the additional defendants using this same format on a separate sheet(s).

Additional Defendants:

DONNA HANSON

MARTIN WINCHESTER

SARAH LANE

• Defendant No. 3

- STEVEN KELLER, 12th Floor Unit Manager

• Place of employment:

201 N. Shartel, OKC, OK 73102

(A) Official & Individual Capacity

• Defendant No. 4

- DONNA HANSON, Health Services Admin. (HSA)

• Place of employment:

201 N. Shartel, OKC, OK 73102

(A) Official & Individual Capacity

• Defendant No. 5

- MARTIN WINCHESTER, Doctor

• Place of employment:

201 N. Shartel, OKC, OK 73102

(A) Official & Individual Capacity

• Defendant No. 6

- SARAH LANE, Director of Nursing (DON)

• Place of employment:

201 N. Shartel, OKC, OK 73102

(A) Official & Individual Capacity

V. Cause of Action

Instructions

1. *Provide a short and plain statement of each claim.*
 - Describe the facts that are the basis for your claim.
 - You can generally only sue defendants who were directly involved in harming you. Describe how each defendant violated your rights, giving dates and places.
 - Explain how you were hurt and the extent of your injuries.
2. *You are not required to cite case law.*
 - Describe the constitutional or statutory rights you believe the defendant(s) violated.
 - At this stage in the proceedings, you do not need to cite or discuss any case law.
3. *You are not required to attach exhibits.*
 - If you do attach exhibits, you should refer to the exhibits in the statement of your claim and explain why you included them.
4. *Be aware of the requirement that you exhaust prison grievance procedures **before** filing your lawsuit.*
 - If the evidence shows that you did not fully comply with an available prison grievance process prior to filing this lawsuit, the court may dismiss the unexhausted claim(s) or grant judgment against you. *See* 42 U.S.C. § 1997e(a).
 - Every claim you raise must be exhausted in the appropriate manner.
5. *Be aware of any statute of limitations.*
 - If you are suing about events that happened in the past, your case may be subject to dismissal under the statute of limitations. For example, for many civil rights claims, an action must be brought within two years from the date when the plaintiff knew or had reason to know of the injury that is the basis for the claim.

6. Do not include claims relating to your criminal conviction or to prison disciplinary proceedings that resulted in loss of good time credits.

- If a ruling in your favor "would necessarily imply the invalidity" of a criminal conviction or prison disciplinary punishment affecting the time served, then you cannot make these claims in a civil rights complaint unless you have already had the conviction or prison disciplinary proceeding invalidated, for example through a habeas proceeding.

Claims

List the federal right(s) that you believe have been violated, and describe what happened. Each alleged violation of a federal right should be listed separately as its own claim.

1. Claim 1:

(1) List the right that you believe was violated:

14th Amendment Right of due process by intentionally
mishandling my legal mail

(2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

Oklahoma County Board of County Commissioners;
Steven Keller

(3) List the supporting facts:

My legal mail has been routinely mishandled in an attempt to thwart my progress in defending myself in court, to thwart me from getting televised which impedes me from getting the medical help I need

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

~~Preliminary Injunction to stop mishandling my legal mail~~
Compensatory damages \$1 million, Punitive damages \$1 million,

2. Claim II:

(1) List the right that you believe was violated:

8th Amendment right to adequate medical care is routinely violated by not properly treating my Havana Syndrome symptoms culminating into cruel and unusual punishment I am suffering everyday and jail staff, among others, knows it.

(2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

Turn Key Health, LLC, Donna Hanson, Sara Lane, Martin Winchester, Steven Keller, Oklahoma Board of County Commissioners

(3) List the supporting facts:

I have been denied treatment for my Havana Syndrome symptoms, denied the ability to even contact entities that could help me with my symptoms, among other ailments.

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

Compensatory damages \$1 million, Punitive damages \$1 million, Preliminary Injunction - contact federal entities that have the abilities to properly treat Havana Syndrome

If there are more than two claims that you wish to assert, describe the additional claims using this same format on a separate sheet(s).

VI. Declarations

I declare under penalty of perjury that the foregoing is true and correct.

Jerry Mor
Plaintiff's signature

6 JUNE 2024
Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 6 day of JUNE, 2024.

Jerry Mor
Plaintiff's signature

6 JUNE 2024
Date

- Claim III:

- (1) 4th Amendment violation of the Equal Protection clause by not notifying the proper federal entities of my Havana Syndrome in order to properly treat my debilitating symptoms thus resulting in the ongoing delay in my treatment.
- (2) TURN KEY Health LLC, Donna Hanson, Sarah Lane, Martin Winchester
- (3) TURN KEY Health, failed to properly treat my Havana Syndrome symptoms and purposely failed to notify entities that could have treated my symptoms and remedied my symptoms in full.
- (4) Compensatory damages \$1 million, Punative damages \$1 million, Preliminary Injunction - contact the Centers for Disease Control and Prevention to properly treat my symptoms.

- Claim IV

- (1) 4th Amendment violation of the Equal Protection clause by placing me on Admin. Segregation and 23 1/2 hour lockdown
- (2) Steven Keller, Oklahoma Board of County Commissioners
- (3) Steven Keller, has routinely violated my right to Equal Protection of the law by having me locked down 23 1/2 hours a day sometimes only giving me 30min of rec. a week.
- (4) Preliminary Injunction - stop 23 1/2 hr lockdown, Compensatory damages \$1 million, Punative damages \$1 million

▽ Cause of Action

P1

On June 19th 2023 I was taken to St. Anthony's Hospital in Oklahoma City, Oklahoma located in downtown OKC, after a 12hr standoff with Okla. City Police. I was given an physical with an EKG to which the nurse informed me that the electrical conductivity on the left side of my heart is abnormal. I asked was it a heart attack waiting to happen and she said, "Yes." I explained my heart problems were due to Havana Syndrome.

Upon admittance to Okla. Cnty. Det. Cntr. on June 23rd 2023 @ approximately 2:30am I complained of chest pains, feeling faint and shortness of breath. I explained this to Sgt. Keller, now Staff Sgt. Keller, to which he replied, "You'd have to be dead before I can take you to medical." I filed a grievance on 13 July 2023 on the GTL system and got no replies. Throughout July, August and September I constantly tried reporting my symptoms of Havana Syndrome and have been denied treatment. On October 7th 2023 I reported blood in my stool and wasn't helped.

Finally after a number of fake EKG reading my blood pressure began to be taken, on 18 November 2023 my blood pressure was 105/69 and I was told it was perfect.

On 22 November 2023 my blood pressure deteriorated further to 89/50 @ 75 bpm and the med nurse Othello, said it was perfect. I have routinely been denied treatment for my Havana Syndrome symptoms in clear violation of my Eighth (8th) Amendment rights. Med-Nurse Stacy routinely denies me my Serenquel because she knows I'm suffering sleep disorder from Havana Syndrome, I pray for relief.

P2

I brought up the St. Anthony physical to prove that CDC/TURN Key Health, a partnership, knew and should have known my Havana Syndrome symptoms are serious and that even a lay-person could easily recognize that I have a medical need. Not only have I received psychological trauma but the deterioration of my heart could have been prevented along with the TBI (Traumatic Brain Injuries)/CONCUSSION(S). No investigations have been made even though I notified the jail that on September 16, 2021 the U.S. Secretary of Defense instructed all personnel, including civilians, to report Havana Syndrome symptoms. My legal mail is being mishandled, on 5 February 2024 my legal mail was sent back to me with a note advising me to unseal my legal mail, on 25 December 2023 I sent out legal-mail to the American Civil Liberties Union - Nat'l Office and on 24 January 2024 my legal mail from the ACLU-Nat'l Office was illegally rejected, also on February 25, 2024 I dialed 0 for medical emergency to report Havana Syndrome symptoms at 11:40pm and was told, "Nobodies gonna help you," then no one would answer when I tried calling again after I'd been hanged up on, my legal-mail to the U.S. DOJ HQ is routinely sent back to me with a note saying unseal it, on 21 Feb. 2024 4 times. My legal mail to the Okla. SAG (State Attorney's General) is done the same way, on 13 Feb. 2024. My injury from illegally mishandled legal-mail is the continuation of the debilitating symptoms of Havana Syndrome, coupled with 23 1/2 hrs lockdown from 27 Dec. 2023 to continuing and on May 15th, 2024 at 3:05pm D.O. Crawford told me S. Sgt Keller, told him he couldn't take my legal mail unless I unseal it, I pray for relief.

P.3

On 21 March 2024 I spoke with Nurse Guyton, task nurse at that time, and she told me her "Provider" said I need 3 or more stool movements with blood in order for it to be considered "serious," because on 3 March 2024 I had blood in my stool again. I've explained to staff numerous times that my ex wife worked for Okla. City Police in some capacity to which their informants would clandestinely gain entry to my apartment and poison my food which would have blood in my stool for up to 15hrs at a time, which I have photographic proof of over a period of about two (2) years.

There has been a slew of other inmates in Calhoun with jail staff, who are informants that I can reveal to the courts, actively trying to harm, threaten and intimidate me into not saying or doing anything about reporting my Anomalous Health Incident(s). I have tried filing Grievances about the informants accessing my NCIC account which only exacerbates these informant-inmates ability to try and spread rumors about me to assist jail-staff in keeping me quiet. I do have certain inmates whom have left Okla. Cnty. Det. Cntr. but will testify to certain jail-staff spreading lies about me. What is worse is that current President of the United States of America, Joe Biden, just signed the Havana Act of 2021 how, why has jail staff not been able to figure out what kind(s) of treatment me and other OCDC inmates are entitled to under the Eighth (8th) Amendment.

P4

I will be attaching exhibits to further show that even though I am being impeded in the process of filing grievances related to exhaustion methods I have tried to do so. Exhibit A will show my futile attempts at 'Administrative Exhaustion.' Exhibit B & Exhibit C will show the intentional and illegal mishandling of my legal mail, I pray for relief. I'm placed on a pod filled with informants which the Unit Manager, Staff Sgt. Keller, knows impedes my access to help, at first he moved me to my previous pod over a false rule violation for battery of another, to which he lied to the Okla. Cnty. Dist. Attorney's Office saying I assaulted a detention officer, no investigation proceeded that write up, I pray for relief. I also have further video proof of Okla. City Police harassment but I would need appointment of counsel, those videos could help me prove why Okla. Cnty. Det. Cntr. staff is treating me with clear and plain deliberate indifference pertaining to my Eighth (8th) Amendment rights, I pray for relief. Also showing that by this Cause of Action in its entirety demonstrates violation of my Fourteenth (14th) Amendment rights and my Fourth (4th) Amendment rights. Today (4-24-24) Lt. Washington S. Sgt. Keller, D.O. Patterson & Med Nurse Kennedy, tried to force me to take my medication in front of them then raided my cell again destroying it. Everyone knows the antagonizing tactics staff uses then claim it erroneously falls within the scope of their employment, it's called targeting and targeting adds to the weight of psychological torture making for cruel and unusual punishment.

P5

OCD has a rat infestation and the 12th floor Unit Manager, Staff Sergeant Keller, knows it yet he has continuously made it a point to destroy my makeshift doors blocks that keep the rats out of my cell. Nobody wants rat feces / urine on their things but for some reason the Unit Manager thinks I do. I spoke to detention officer Ross, and she told me that the Unit Manager told her to give me only 30min. of recreation time and she said she is following orders, that is what she is supposed to do. Just like Congresswoman Stacey Plaskett said, "Law Enforcement has become the new gestapo." Lt. Washington also threatened to have me taken off my medication. Sgt. Keller took my socks, my pants and my towel literally just to hurt me. I'm even being denied aspirin/ibuprofen because almost all jail staff knows, from me telling them that migraines are associated with Synthetic Telepathy. On 18 March 2024 I spoke with Nurse Joshua, task nurse at that time, about blood in my stool and Havana Syndrome and he gave me 2 aspirin that day for migraines and that was it. I'm not writing this to say I know law enforcement and their informants are causing people Havana Syndrome, whether I can prove that or not, I'm informing the Court I am being denied treatment for my Havana Syndrome symptoms and denied the ability to contact the appropriate government entities or non government entities to open an investigation into whom is causing my Havana Syndrome and to properly treat my symptoms.

P6

On 4/21/2024 to 4/27/2024 my cell was raided by detention officers, now I've been moved to Staff Sergeant Keller's special lockdown pod 12-B., twenty-three in one half hour (23½) lockdown for everybody all while experiencing Havana Syndrome, I pray for relief. I also believe, based on recent encounters, Staff Sgt. Steven Keller, is putting poison in my food. I am also letting this court know my whole family was threatened by police, federal & local, to remain quiet about my/our ordeal involving Remote Neural Monitoring. I also would like to make known to the courts that I do not want to end up like John Basco of Okla. City for filing suit standing up for my rights as an U.S. Citizen and human being, I pray for relief. Based on information and belief, everybody should be aware that untreated Havana Syndrome symptoms are so debilitating that compensation had to be given to Havana Syndrome sufferers through the H.A.V.A.N.A. Act of 2021, I pray also for relief. I called medical at approx. 8pm, 4/29/2024 for dangerously low blood pressure and nobody showed up to take me to medical, I pray for relief. Furthermore, 12-B pod monitor Cristina Byers only gives us/me 30min of recreation because of the 12th Floor Unit Manager's direction — Staff Sergeant Steven Keller. Once again on June 2nd, 2024 at 4:15pm I called emergency medical for low blood pressure and feeling faint and some white lady hanged up on me.

P7

Just today (5/2/2024) I tried dialing zero (0) for severe abdominal pain and nausea, I notified 1A-B "bubble" guard, Mrs. Cristina Byers, while out on 30min. rec of my medical need too. Then at approximately 3:50pm S. Sgt. Keller, was doing "count" and I told him could he take me to medical and his response was, "I can't because you're suing me. Technically I'm not even supposed to be talking to you." Blatant disregard for my medical need(s). I will add that at approximately 8am today trash nurse, for that day, Maranda, came to speak with me about my medical request pertaining to my heart problems, albeit after trying to file this suit. Even now I'm ironically being ushered off to the Oklahoma Forensic Center located in Vinita, OK, because they are trying to silence me. I sincerely pray for relief. On March 11 2024, I complained of chest pain and spoke to a Nurse Jessica, I told her about my June 19, 2023, visit to St. Anthony's Hospital she then denied the outcome of that medical check-up, claimed that since my status was mental health observation and that I also took Prozac that I'm just suffering anxiety, I pray for relief. I just notified medication nurse Sparkman, about blood in my stool, he denied it is, then wouldn't give me the "Head" nurse's name - just Donna. I have been complaining of everything in this cause of action since my incarceration and as explained herein have been denied treatment for medical, my legal mail is still mishandled or rejected, I've not been given cleaning supplies to get rid of the feces and urine stench, my mat was urinated on and because of the tears in it, it leaks of urine and I have't been given a sanitary mat. Also, Captain Atoki, is an jail administrator.

P.8

My severe abdominal pain and nausea have continued to 8:31am. I asked the lieutenant doing count (Reeves) could he take me to medical and his response, as per everytime I ask, was, "I can't take you unless it's an emergency."

Excruciating abdominal pain and nausea all day, I pray for relief. Too many inmates have died in OCDC for staff to be so non-chalant and indifferent to my pleas for help. I was in fact told I was scheduled to see a doctor in the morning, so I'm up all night in excruciating pain if I eat or drink anything. At approximately 8:30am I spoke to another Task Nurse ("Barley") (5/3/24) about my stomach pains and nausea he asked some questions told me the "Provider's" name Sarah Lane - Director of Nursing and the Doctor, Mr. Mark Winchester. Now TURN KEY's "policy or custom" has been, "Not to accept anyone to sick bay (13th floor) unless it is an emergency." At the rate OCDC inmates have been dying I'd say that policy/custom contributes to clear cut indifference, I pray for relief. I just learned S. Sgt. Keller, went into my cell (12-B-16) while I was at court May 1st, 2024 he went through my legal work and I know he did it because he ripped out the enclosure that states "Please use the following address," I NEVER took that out because I'm not done with my paperwork yet plus the guy in cell 17 told me S. Sgt. Keller, went into my cell to get a tablet. That is why S. Sgt. Keller, said he wouldn't take me to medical because I am suing him, isn't confidentiality the whole point in why legal mail has protection(s)? Just now D.O. Patterson, wouldn't take my legal mail at dinner on 5/3/24, I've brought the Court "up to speed" of my situation and writing it as it happens. I do not want to die.

GRIEVANCES sent to try and exhaust Administrative Remedies
the court could subpoena these.

Medical Requests

* 1-04-2024 5:20pm

Safety & Sanity

TK-iZrzwifUomNm

Re:

2-07-2024 6:05pm

TK-kqAsop9E9H6M

Re:

3-14-2024 7:05pm

TK-uNn855OVX+Yr

1-23-2024 7:27pm

Courses (ex wife works for OCPD)

TK-XQBNDKKhABsJ

1-24-2024 8:32pm

Trust Account (Certified Copies)

TK-RhP8GCM8cEvD

2-23-24 11:56pm

Mental Health (movement)

TK-p5RvsV855Mz8

* 1-4-2024 5:20pm

Placement (ATTN: Capt. Atohi)

TK-iZrzwifUomNm

Response by Capt. Atohi

4-3-2024 1:02pm

11-18-2023 2:36pm

Blood Pressure (Being followed)

TK-gXY+j.3WBUINM

4-23-2024 10:30pm

In Re: #TK-jFjGdVxRNUxB

Medical Attention - Grievance

11-11-2023 10pm

Blood Pressure

TK-VaStZ93ZyFMh

12-14-2023 5:35am

TK-dY20H1ptBsbM

MIGRAINES

12-28-2023 11:57pm

Hazel Problems

TK-h+Fluz+AYIS1's

* 1-19-2024 6:25am

Denied Medical Att. (Sec. of Defense Sept. 16, 2021)

TK-nza2N5IfjBvF

1-24-2024 7:14pm

Symptom Relief (Havana Syndrome)

TK-I4ANJtQgrj8

2-07-2024 6:14pm

Symptom Relief (Havana Syndrome)

TK-Omk9opjvhUJY

2-23-2024 2:31am

Headaches

TK-BPxvpAB984yC

2-23-2024 2:39am

I.B.S

TK-DE6D03Qolyov

3-14-2024 7:55pm

Medical Attention - Grievance

TK-d8XX2Pw5gg20

↑ 4-16-2024 7:06pm

TK-jFjGdVxRNUxB (I Dean: Have a great day.)

5-22-2024 11:27pm

Certified Copies (Trust Acct.)

TK-gpNUrzel4pmQ

5-14-2024 5:32pm

ATTN: Legal Mail Clerk

TK-dOwVqV29Cg8lw